

**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO**

IN RE:

CASE NO: 13- 00415 EAG

JOSE VEGA ARROYO

Debtor's

Chapter 13

MOTION TO AMEND PLAN

TO THE HONORABLE COURT:

COMES NOW, JOSE VEGA ARROYO , through the undersigned attorney and respectfully avers and prays:

1. The debtor is submitting an Amended Plan since the proposed plan is insufficiently funded to pay 100% + legal interest at 4.25 .

WHEREFORE, the debtor prays that the Amended plan dated 12/20/2013 be considered for confirmation.

CERTIFICATE OF SERVICE: I hereby certify that on December 20 , 2013, I electronically filed the present motion, with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the CMF/ECF participants and I hereby certify that I have mailed by United States Postal Service the present motion to the non CM/ECF participants as per the attached mailing list.

In Yauco, Puerto Rico this 20^{sd} day of December 2013.

/S/Nydia Gonzalez Ortiz
USDC-PR 124006
Attorney for Debtor
SANTIAGO & GONZALEZ
11 Betances Street
Yauco, Puerto Rico 00698
Phones (787) 267-2205/2252
Fax: (787) 267-6211

13-00415-EAG13 JOSE RAMON VEGA ARROYO

Creditors

ALFREDO CANCEL IRIZARRY PO BOX 427 LAJAS PR 00667 (3637500)	11 CALLE BETANCES YAUCO PR 00698 (3637499)	(cr) INTERNAL REVENUE SERVICES PO BOX 16236
(cr) AUTORIDAD DE ENERGIA ELECTRICA DE PR PO BOX 363508 SAN JUAN PR 00936 (3637501)	DEPARTAMENTO DE HACIENDA NEGOCIADO DE CONTRIBUCIONES DE COBRO PO BOX 2520 TRUJILLO ALTO PR 00977 2520 (3637503)	PHILADELPHIA PA 19114 0236 (3637506) (cr) IRS INTERNAL REVENUE SERVICE KANSAS CITY MO 64999 0202 (3637507)
(cr) BANCO POPULAR PO BOX 362708 SAN JUAN PR 00936 3228 (3637502)	(cr) DEPARTMENT OF THE TREASURY INTERNAL REVENUE SERVICE PHILADELPHIA PA 19154 0030 (3637504)	(cr) IRS MERCANTIL BUILDING 2 PONCE DE LEON AVENUE SUITE 1014 SAN JUAN PR 00918 (3637508)
(cr) BANCO POPULAR DE PUERTO RICO BANKRUPTCY DEPARTMENT PO BOX 366818 SAN JUAN PR 00936-6818 (3661891)	(cr) DEPARTMENT OF TREASURY BANKRUPTCY SECTION SUITE 1504 235 AVE ARTERIAL HOSTOS SAN JUAN PR 00918 (3637505)	(cr) MONEY HOUSE PR COM 52 CALLE PASEO COVADONGA PUERTA DE TIERRA SAN JUAN PR 00901 (3637509)
(cr) BUFETE SANTIAGO & GONZALEZ		(cr)

POPULAR AUTO

BANKRUPTCY

DEPARTMENT

PO BOX 366818

SAN JUAN PUERTO

RICO 00936-6818

(3661895)

(cr)

United States Bankruptcy Court
District of Puerto Rico

IN RE:

Case No. **13-00415****VEGA ARROYO, JOSE RAMON**Chapter **13**

Debtor(s)

CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____ <input checked="" type="checkbox"/> PRE <input type="checkbox"/> POST-CONFIRMATION		<input checked="" type="checkbox"/> AMENDED PLAN DATED: 12/20/2013 Filed by: <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other																																																																			
I. PAYMENT PLAN SCHEDULE <table style="width:100%;"> <tr> <td>\$</td> <td style="text-align: right;">410.00</td> <td>x</td> <td style="text-align: right;">17</td> <td>= \$</td> <td style="text-align: right;">6,970.00</td> </tr> <tr> <td>\$</td> <td style="text-align: right;">610.00</td> <td>x</td> <td style="text-align: right;">18</td> <td>= \$</td> <td style="text-align: right;">10,980.00</td> </tr> <tr> <td>\$</td> <td style="text-align: right;">960.00</td> <td>x</td> <td style="text-align: right;">25</td> <td>= \$</td> <td style="text-align: right;">24,000.00</td> </tr> <tr> <td>\$</td> <td></td> <td>x</td> <td></td> <td>= \$</td> <td></td> </tr> <tr> <td>\$</td> <td></td> <td>x</td> <td></td> <td>= \$</td> <td></td> </tr> </table> <p style="text-align: right;">TOTAL: \$ 41,950.00</p> <p>Additional Payments: \$ _____ to be paid as a LUMP SUM within _____ with proceeds to come from: _____</p> <p><input type="checkbox"/> Sale of Property identified as follows: _____</p> <p><input type="checkbox"/> Other: _____</p> <p>Periodic Payments to be made other than, and in addition to the above: \$ _____ x _____ = \$ _____</p> <p>PROPOSED BASE: \$ 41,950.00</p>		\$	410.00	x	17	= \$	6,970.00	\$	610.00	x	18	= \$	10,980.00	\$	960.00	x	25	= \$	24,000.00	\$		x		= \$		\$		x		= \$		II. DISBURSEMENT SCHEDULE A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____ B. SECURED CLAIMS: <input type="checkbox"/> Debtor represents no secured claims. <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows: 1. <input type="checkbox"/> Trustee pays secured ARREARS: <table style="width:100%;"> <tr> <td>Cr. _____</td> <td>Cr. _____</td> <td>Cr. _____</td> </tr> <tr> <td># _____</td> <td># _____</td> <td># _____</td> </tr> <tr> <td>\$ _____</td> <td>\$ _____</td> <td>\$ _____</td> </tr> </table> 2. <input type="checkbox"/> Trustee pays IN FULL Secured Claims: <table style="width:100%;"> <tr> <td>Cr. _____</td> <td>Cr. _____</td> <td>Cr. _____</td> </tr> <tr> <td># _____</td> <td># _____</td> <td># _____</td> </tr> <tr> <td>\$ _____</td> <td>\$ _____</td> <td>\$ _____</td> </tr> </table> 3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: <table style="width:100%;"> <tr> <td>Cr. _____</td> <td>Cr. _____</td> <td>Cr. _____</td> </tr> <tr> <td># _____</td> <td># _____</td> <td># _____</td> </tr> <tr> <td>\$ _____</td> <td>\$ _____</td> <td>\$ _____</td> </tr> </table> 4. <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder: _____ <p>5. <input type="checkbox"/> Other: _____</p> <p>6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to: MONEY HOUSEPR.C</p> <p>C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2) <i>Treasury - 100%</i></p> <p>D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims. 1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____ <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____</p> <table style="width:100%;"> <tr> <td>Cr. _____</td> <td>Cr. _____</td> <td>Cr. _____</td> </tr> <tr> <td># _____</td> <td># _____</td> <td># _____</td> </tr> <tr> <td>\$ _____</td> <td>\$ _____</td> <td>\$ _____</td> </tr> </table> <p>2. Unsecured Claims otherwise receive PRO-RATA disbursements.</p> <p>OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.) PAY 100% + 4.25 LEGAL INTEREST</p>		Cr. _____	Cr. _____	Cr. _____	# _____	# _____	# _____	\$ _____	\$ _____	\$ _____	Cr. _____	Cr. _____	Cr. _____	# _____	# _____	# _____	\$ _____	\$ _____	\$ _____	Cr. _____	Cr. _____	Cr. _____	# _____	# _____	# _____	\$ _____	\$ _____	\$ _____	Cr. _____	Cr. _____	Cr. _____	# _____	# _____	# _____	\$ _____	\$ _____	\$ _____
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III. ATTORNEY'S FEES (Treated as § 507 Priorities) Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ 3,000.00		Signed: <u>/s/ JOSE RAMON VEGA ARROYO</u> Debtor _____ Joint Debtor																																																																			

Attorney for Debtor **Bufete Santiago & Gonzalez** */s/ Nidia Gonzalez 01/12* Phone: **(787) 267-2205**